

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JOHN V. BROWN
a/k/a "FOOTBALL",

Defendant.

) Criminal No. 8:15-CR-111(FJS)
)
) Indictment
)
) Violation: 21 U.S.C. § 841(a)(1)
) [Possession with the Intent to
) Distribute a Controlled
) Substance]
)
)
)
) 1 Count
)
) County of Offense: Clinton

THE GRAND JURY CHARGES:

COUNT 1

[Possession with Intent to Distribute a Controlled Substance]

Between in or about July, 2014 and on or about December 10, 2014 in Clinton County in the Northern District of New York, the defendant,

JOHN V. BROWN a/k/a "FOOTBALL",

knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

ALLEGATION REGARDING PREVIOUS FELONY DRUG CONVICTION

The defendant, **JOHN V. BROWN**, aka "FOOTBALL" is subject to increased punishment, pursuant to Title 21, United States Code, Sections 841(b)(1)(B), because of the following prior convictions for a felony drug offense which has become final:

JOHN V. BROWN was convicted on or about September 14, 2009, in the New York County Supreme Court, New York, of Attempted Criminal Sale of a Controlled Substance in the Third Degree, a class C felony, and was sentenced to time served.

JOHN V. BROWN was convicted on or about July 15, 1992, in the New York County Supreme Court, New York, of Criminal Possession of a Controlled Substance in the Fifth Degree, a class D felony, and was sentenced to five years probation.

FORFEITURE ALLEGATION

1. The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant, **JOHN V. BROWN, a/k/a "FOOTBALL,"** shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT

A money judgment in the amount of \$207,250.00 in U.S. Currency.

Substitute Assets

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,


it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeiture judgment.

Dated: April 8, 2015

A TRUE BILL,

Grand Jury foreperson

RICHARD S. HARTUNIAN
United States Attorney

By: 
Douglas G. Collyer
Assistant United States Attorney
Bar Roll No. 519096